

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE FACEBOOK, INC. IPO SECURITIES
AND DERIVATIVE LITIGATION

MDL No. 12-2389 (RWS)

This document relates to the
Consolidated Securities Action:

No. 12-cv-4081	No. 12-cv-4763
No. 12-cv-4099	No. 12-cv-4777
No. 12-cv-4131	No. 12-cv-5511
No. 12-cv-4150	No. 12-cv-7542
No. 12-cv-4157	No. 12-cv-7543
No. 12-cv-4184	No. 12-cv-7544
No. 12-cv-4194	No. 12-cv-7545
No. 12-cv-4215	No. 12-cv-7546
No. 12-cv-4252	No. 12-cv-7547
No. 12-cv-4291	No. 12-cv-7548
No. 12-cv-4312	No. 12-cv-7550
No. 12-cv-4332	No. 12-cv-7551
No. 12-cv-4360	No. 12-cv-7552
No. 12-cv-4362	No. 12-cv-7586
No. 12-cv-4551	No. 12-cv-7587
No. 12-cv-4648	

**PLAINTIFFS' NOTICE OF MOTION AND MOTION TO STRIKE THE
EXPERT REPORT OF ANINDYA GHOSE, PH.D.**

PLEASE TAKE NOTICE that Court-appointed Lead Plaintiffs North Carolina Department of State Treasurer on behalf of the North Carolina Retirement Systems, Arkansas Teacher Retirement System, and Fresno County Employees' Retirement Association, as well as Individual Named Plaintiffs Jose G. Galvan and Mary Jane Lule Galvan, and additional proposed individual class representatives Eric Rand, Paul and Lynn Melton, and Sharon Morley (collectively, "Plaintiffs"), by and through their undersigned counsel, will and hereby do move this Court, before the Honorable Robert W. Sweet in Courtroom 18C of the Daniel Patrick Moynihan Courthouse at 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order, pursuant to Federal Rule of Evidence 702 and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), striking the Expert Report of Anindya Ghose, Ph.D., submitted by Defendants in the above-captioned action in support of their Opposition to Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Counsel, and granting such further relief as the Court deems just and proper.

Plaintiffs' motion is supported by the accompanying Memorandum of Law in Support of Their Motion to Strike the Expert Report of Anindya Ghose, Ph.D. and the Declaration of Salvatore J. Graziano in Further Support of Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Class Counsel, dated June 16, 2015.

Pursuant to the Stipulation and Protective Order dated May 13, 2014 [ECF No. 236], Plaintiffs' Memorandum of Law in Support of Their Motion to Strike the Expert Report of Anindya Ghose, Ph.D., as well as the Declaration of Salvatore J. Graziano in Further Support of Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Class Counsel, dated June 16, 2015, and the exhibits thereto, will be filed under seal consistent with the Court's Sealed Records Filing Instructions.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1, opposing papers, if any, shall be served within fourteen days after service of moving papers, and reply papers, if any, shall be served within seven days after service of any opposing papers.

Dated: June 16, 2015
New York, New York

BERNSTEIN LITOWITZ
BERGER & GROSSMANN LLP

By: _____
Max W. Berger
Salvatore J. Graziano
John J. Rizio-Hamilton
1285 Avenue of the Americas
New York, NY 10019
Tel: (212) 554-1400
Fax: (212) 554-1444

*Co-Lead Counsel For Lead Plaintiffs And The
Proposed Class*

Thomas A. Dubbs
James W. Johnson
Thomas G. Hoffman, Jr.
LABATON SUCHAROW LLP
140 Broadway
New York, NY 10005
Tel: (212) 907-0700
Fax: (212) 818-0477

*Co-Lead Counsel For Lead Plaintiffs,
Proposed Class Representative Sharon
Morley And The Proposed Class*

Steven E. Fineman
Nicholas Diamand
LIEFF CABRASER
HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
Tel: (212) 355-9500
Fax: (212) 355-9592

*Additional Counsel For Additional Named Plaintiffs And Proposed Class Representatives
Jose G. Galvan And Mary Jane Lule Galvan*

Frank R. Schirripa
HACH ROSE SCHIRRIPA
& CHEVERIE LLP
185 Madison Ave
New York, New York 10016
Tel: (212) 213-8311
Fax: (212) 799-0028

Additional Counsel For Proposed Class Representatives Eric Rand, And Paul And Lynn Melton